JACKSONVILLE, ARKANSAS 72078 P.O. Box 647 Ph. 982-0528 Pathfinder, Inc.

Attn: John Heyer  Frax: (703) 603-0655  Fax: (501)982-1781  Phone: (501)982-0528  Message: RE: Docket No. 2004-01-01  Mr. Heyer:  Please consider our comments concerning  proposed rules by the Committee after removing  this cover sheet.  Thank you,  CONFIDENTIAL INFORMATION  This fax contains confidential information. This message is intended for the use of the entity to which it is addressed and may conformation that is privileged, confidential and exempt from disclosure under applicable law. If the reader is not the intended employ agent responsible for delivering the message to the lineaded explicitle, you are applicable law. If the reader is not the intended employ agent responsible for delivering the message to the lineaded explicitle, you are hereby notified that any desamination, distribution, or co is strictly prohibited. If you have received this fax in error please call the phone number above immediately and return the original to us address above! Thank you.  Total Pages (Including Cover)	To: The Committee	Date: 6 rep 2005
Fax: (703) 603-0655  Contract@pathfinderinc.org Fax: (501)982-1781 Phone: (501)982-0528  Message: RE: Docket No. 2004-01-01  Mr. Heyer:  Please consider our comments concerning proposed rules by the Committee after removing this cover sheet.  Thank you,  Thank you,  CONFIDENTAL INFORMATION  This fax contains confidential information. This message is intended for the use of the entity to which it is addressed and may conformation that is privileged, confidential and exempt from disclosure under applicable law. If the reader is not the intended employ agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or construction in the confidential and exempt from disclosure under applicable law. If the reader is not the intended employ agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or constructions are constructed in the phone number above immediately and return the original to us address above! Thank you.	Attn: John Heyer	<del>-</del>
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Committee for Purchase from People Who Are Blind or Severely Disabled Attn: Docket No. 2004-01-01 1421 Jefferson Davis Highway Jefferson Plaza 2, Suite 10800 Arlington, VA 22202-3259

Re: Docket No. 2004-01-01:

Comments of a Large Non-Profit Agency (NPA)

We represent a large NPA, which serves daily more than 900 people with disabilities and employees more than 120 people working on contracts under the JWOD Program.

We already comply with all aspects and intent of the proposed rules: from board policies and structure to independent auditing to executive compensation to avoidance of any conflict of interest. We are particularly attuned to public perception and oversight by NISH and the Committee and by the Commission on Accreditation of Rehabilitation Facilities (CARF).

What we object to is the apparent duplication and extra expense of out of cycle reporting. The extra expense of completing forms for the Committee which duplicates the IRS form 990 and other forms required by state government will be an added cost which takes monies away from direct care service. It will punish those for whom the jobs are created and leave the violators alone.

It seems the Committee is aiming all requirements at a small contingent of NPA's who may be giving the non-profit community a bad name. We suggest a complete re-write of the proposed regulations which allows the Committee the authority to further delve into the organizational makeup and policies of those NPA's who do not demonstrate compliance during the Committee's bi-annual compliance audits and leave alone the vast majority who willingly comply.

We appreciate the opportunity to comment.